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35 **UNITED STATES DISTRICT COURT**
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37 **DISTRICT OF ARIZONA**
38
39 **PHOENIX DIVISION**

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41 Christian Copyright Licensing International, LLC,
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43 Plaintiff/Counterdefendant,
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45 vs.
46
47 Multitracks.com LLC,
48
49 Defendant/Counterclaimant.

50 Case No. 2:23-cv-00368-DWL

51
52 **STIPULATION FOR**
53 **EXTENSION OF TIME TO**
54 **ENGAGE IN GOOD FAITH**
55 **SETTLEMENT TALKS**

1 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
 2 above captioned action, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and the
 3 Court's Preliminary Order (Doc. 8), that the Parties request the Court to extend the
 4 deadline to engage in good faith settlement talks from March 8, 2024, to **April 26, 2024**.
 5 (*See Doc. 22 ¶ 11.*) The parties further request that the Court authorize the parties and
 6 their counsel to meet and engage in good faith settlement talks via remote video means
 7 (e.g., Zoom).

8 The parties submit that good cause justifies the requested extension of time. The
 9 parties completed fact discovery, including depositions on March 1, 2024, in accordance
 10 with the Court's Case Management Order. The parties believe that settlement discussions
 11 will be more productive once the parties and their counsel have had a more fulsome
 12 opportunity to review the pertinent documents exchanged during discovery, the
 13 deposition transcripts, and expert disclosures (if any) made in the coming weeks. The
 14 parties are also discussing whether to retain a third-party neutral to assist with settlement
 15 discussions, and additional time would be needed to schedule a mediation with a neutral.

16 The parties further request permission to engage in good faith settlement talks via
 17 remote video means, rather than in person, because the parties and their counsel in this
 18 case are geographically dispersed across Arizona, California, Texas, Tennessee, and
 19 Washington. The parties conducted depositions in this case via Zoom by agreement and
 20 are confident that, based on that track record, they can effectively engage in good faith
 21 settlement discussions via Zoom.

22 Accordingly, the parties stipulate and agree (1) to extend the deadline to engage in
 23 good faith settlement talks to April 26, 2024 (2) by remote video means.

1 Dated: March 8, 2024 Loeb & Loeb LLP

2 By: /s/ Andrew M. Hutchison

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